

ATTN: Michiel Fransen
Head of Standards and Science
Aquaculture Stewardship Council
consultation@asc-aqua.org

Dear Mr. Fransen,

Re: ASC Farm Standard Public Consultation V, Criterion 2.17 Intermediate Sites

As stakeholders to the ASC, and the industry it seeks to certify, we are formally submitting our comments and concerns regarding ASC Farm Standard's proposed compliance and verification requirements for the "pre-growout phase" under Criterion 2.17 - Hatcheries and Intermediate Sites.

We welcome the ASC addressing the issue of intermediary farms.

Currently the ASC "farmed responsibly" label on a farmed salmon product gives the impression to consumers that the salmon was "farmed responsibly" from hatchery to harvest. However, in actuality, an ASC-labelled salmon is likely to have met the ASC standard for only some of its production cycle: the hatchery and final growout farm stages. From a consumer perspective, this could be viewed as misleading.

The ASC's 2017 decision to exclude intermediary farms from compliance contravened the original intent of the Salmon Standard to "minimize or eliminate the social and environmental impacts" associated with a farmed salmon's production cycle. In practice, more than a year of a farmed salmon's production cycle can be left unassessed for environmental and social impacts against the ASC standard. This places a risk that irresponsible farming practices have gone unnoticed under the guise of ASC's "farmed responsibly" label.

We appreciate ASC has taken steps to reinstate this intent by requiring that the complete production cycle must comply with the new Farm Standard. This will help to eliminate gaps where irresponsible practices could be currently missed and still sold under the ASC label, as well as help to meet consumer expectations that the ASC label sustainability claim of "responsibly farmed" is applicable from egg to harvest – not just some of the cycle time.

However, any gains made by reinstating the intent are likely to be undermined by ASC's proposal to have the Unit of Certification (i.e. the growout farm applying for certification) internally audit their "suppliers" for standard compliance, instead of having third-party conformity assessment bodies (CABs) undertake the audit.

As growout salmon farms are typically owned by the same company that also owns and operates the hatchery and early net pen sites, this will result in companies auditing themselves for ASC compliance for a substantial portion of the production cycle (from 12 to 30 months out of a 36~ month farmed salmon production cycle).

Any ‘fox guarding the henhouse’ scenarios have no place in credible certifications.

As ASC is an ISEAL member, consumers should be able to trust that ASC is meeting ISEAL’s Credibility Principle of Impartiality:

“A credible sustainability system identifies and avoids or mitigates conflicts of interest throughout its governance and operations, particularly when it comes to assessing its users’ performance”.

In addition, ASC should comply with ISEAL’s Assurance Code of Good Practice, which states under “Rigour and Impartiality” that:

“Independent assessment is a necessary component of schemes that allow public claims of compliance. Third party, independent, accredited certification is the most credible form of assessment.”

We also point out that ASC’s lack of third-party auditing of pre-growout farm sites could be seen as a program weakness in comparison to its main competitor, the Best Aquaculture Practices (BAP). In addition to their Salmon Farm Standard for final growout farms, the BAP certification oversees a Finfish, Crustacean and Mollusk Hatcheries and Nurseries certification standard for pre-growout sites. This means under the BAP standards and process, the farming cycle from hatchery to harvest is audited by independent auditors.

The proposal to have the final growout site internally audit pre-growout “suppliers” for compliance with the standard – including those “suppliers” that are the very same company that owns the final growout – is unacceptable and a credibility risk for the ASC, as the auditing process lacks impartiality and independent oversight.

We strongly urge the ASC to amend its proposal for Criterion 2.17 to stipulate that ASC compliance for the complete production cycle must be verified by third-party accredited conformity assessment bodies, in line with ASC’s ISEAL obligations.

Signed,

TAMARA OJEDA URIBE, AGRUPACIÓN TURÍSTICA, CULTURAL Y MEDIOAMBIENTAL MAR Y TIERRA



DR. STEPHEN SUTTON, HEAD OF OUTREACH & ENGAGEMENT, ATLANTIC SALMON FEDERATION



ADRIAN MEDER, SUSTAINABLE SEAFOOD PROGRAM MANAGER, AUSTRALIAN MARINE CONSERVATION SOCIETY



BEC HOWARTH, MARINE AND FISH FARMS CAMPAIGNER, BOB BROWN FOUNDATION



BONNY GLAMBECK, CAMPAIGNS DIRECTOR, CLAYOQUOT ACTION SOCIETY



DR. KRZYSZTOF WOJTAS, HEAD OF FISH POLICY, COMPASSION IN WORLD FARMING & RETHINK FISH CAMPAIGN



MATTHEW ABBOTT, FUNDY BAYKEEPER, CONSERVATION COUNCIL OF NEW BRUNSWICK



KILIAN STEHFEST, MARINE CONSERVATION SPECIALIST, DAVID SUZUKI FOUNDATION



JUAN CARLOS VIVEROS, DIRECTOR EJECUTIVO, DEFENDAMOS CHILOÉ



SIMON RYDER-BURBIDGE, MARINE CAMPAIGN COORDINATOR, ECOLOGY ACTION CENTRE



JILLY MIDDLETON, LEAD MARINE CAMPAIGNER, ENVIRONMENT TASMANIA



LUCERO GONZALEZ, BIODIVERSITY CAMPAIGNER, GEORGIA STRAIT ALLIANCE



SARAH KING, HEAD OF OCEANS & PLASTICS CAMPAIGN, GREENPEACE CANADA



BRIAN MULDOON, PRESIDENT, HEALTHY BAYS NETWORK



CORIN SMITH, FOUNDER, INSIDE SCOTTISH SALMON FEEDLOTS



GERARD CASTLES, KILLORA COMMUNITY ASSOCIATION



KAREN WRISTEN, EXECUTIVE DIRECTOR, LIVING OCEANS SOCIETY



BEVERLEY DOOLE, MARLBOROUGH ENVIRONMENT CENTRE



MAX BELLO, GLOBAL OCEAN POLICY ADVISOR, MISSION BLUE



MARK SHERWOOD, EXECUTIVE DIRECTOR, NATIVE FISH SOCIETY



MARK BUTLER, SENIOR ADVISOR, NATURE CANADA



PETER GEORGE, PRESIDENT, NEIGHBOURS OF FISH FARMING



Defending Our Environment

GARY SPENCER, CHAIR, HABITAT AND AQUACULTURE COMMITTEE, NEW BRUNSWICK SALMON COUNCIL INC



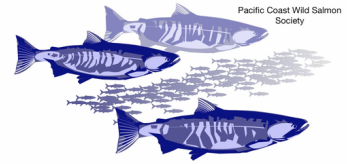
ELVAR FRIDRIKSSON, PROGRAM DIRECTOR, NORTH ATLANTIC SALMON FUND



AARON KINNARI , HEAD OF GROWTH, ONLY ONE



ALEXANDRA MORTON, INDEPENDENT BIOLOGIST, PACIFIC COAST WILD SALMON SOCIETY



MICHEAL LONG, DIRECTOR OF OPERATIONS, PARLEY FOR THE OCEANS



MARTINA SASSO, COORDINADORA DEL PROGRAMA MARINO, REWILDING ARGENTINA FOUNDATION



ANDREW GRAHAM-STEWART, DIRECTOR , SALMON AND TROUT CONSERVATION SCOTLAND



DR. LISA-ANN GERSHWIN, RESEARCH SCIENTIST, SALMON REFORM ALLIANCE



KELLY ROEBUCK, LIVING OCEANS REPRESENTATIVE, SEACHOICE



DIEGO JIMÉNEZ, DIRECTOR, IMPACT MEDIA, SEA LEGACY



JULIA HILL, PROJECT COORDINATOR, SKEENAWILD CONSERVATION TRUST



TRISH BAILY, VICE CHAIR, TASMANIAN ALLIANCE FOR MARINE PROTECTION

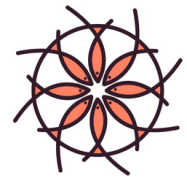


PETER MCGLONE, CEO, TASMANIAN CONSERVATION TRUST



**tasmanian
conservation trust inc**

TRISH BAILY, REPRESENTATIVE, TASMAN PENINSULA MARINE PROTECTION



**Tasman Peninsula
Marine Protection**

**CHRISTINE COUGHANOWR, INDEPENDENT SCIENTIST,
TASMANIAN INDEPENDENT SCIENCE COUNCIL**

**TASMANIAN
INDEPENDENT SCIENCE
COUNCIL**

STAN PROBOSZCZ, SCIENCE & CAMPAIGN ADVISOR, WATERSHED WATCH SALMON SOCIETY



KURT BEARDSLEE, EXECUTIVE DIRECTOR, WILDFISH CONSERVANCY



CORIN SMITH, OWNER & GUIDE, WILD RISE COMPANY



TONY ALLARD, CHAIR, WILD SALMON FOREVER & WILD FIRST



Attachment - Survey Questionnaire Submission

Q. *By filling in this survey, I agree with my responses being made public. Your responses won't be attributed to your name or the name of your organisation. If you choose NO, the survey will be terminated and you won't be able to complete this survey.

Yes/No

Q. *Name: See Signatories

Q. *Organisation name: See Signatories

Q. *Type of affiliation: Civil society groups

Criterion 2.17 - Hatcheries and Intermediate Sites

Q. ASC aims to address the impact of pre-Grow Out sites (e.g. hatcheries) using the same indicators as for Grow Out sites. Do you agree this aim is feasible?

Answer options: **X strongly agree** – agree – neutral – disagree – strongly disagree + don't know / no opinion

Q. Which option do you prefer to verify compliance of the pre-Grow Out sites?

Option 1: on-site inspections of the pre-Grow Out sites by a qualified internal auditor from the Unit of Certification (UoC), using the ASC inspection template, reviewed by the Conformity Assessment Body (CAB) during the UoC audit with spot-checks as necessary by third-party auditors of intermediate sites in salmon production

Option 2: on-site audits by third party Conformity Assessment Body (CAB) auditors or by UoC auditors with equivalent qualifications

X Other - please specify: On-site audits by an accredited third-party Conformity Assessment Body (CAB).

Q. This proposal separates production into "pre-growout" and "growout", with the growout phase comprising the site of audit, or the Unit of Assessment (UoA). For finfish, the "pre-growout" phase will include any sites used prior to the harvest site (e.g. hatchery site, intermediate site or holding site). Shrimp will include any production units holding shrimp from PL25 onwards. Abalone and bivalve will include any sites from the point of translocation onwards.

Do you agree these definitions adequately cover the sites used and potential impacts as intended?

Answer options: strongly agree – **X agree** – neutral – disagree – strongly disagree + don't know / no opinion

Comment: **Broodstock sites should be included in the "pre-grow out" phase. Including broodstock sites, would change our answer to strongly agree.**

General Comments:

See Letter.